

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

Deel, *et al.*

Defendants.

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Case No. 4:22-cr-612

The Honorable Andrew S. Hanen

**United States' Response in Opposition to Defendant Deel's Motion to Remove GPS
Monitoring**

The United States, by and through undersigned counsel, opposes Defendant Deel's request to remove his GPS monitoring device so that he may vacation and take personal engagement photographs unencumbered. The United States does not object to the travel. But Defendant Deel makes no relevant argument as to why a change in GPS monitoring is warranted.

Indeed, the relevant Section 3142(g) factors counsel for the opposite conclusion, as the Court recently ruled for Defendant Rybarczyk. (*See* ECF No. 341.) Most critically, the strength of the case against Defendant Deel only grows along with his risk of flight. Relative to several of his co-Defendants, Defendant Deel's activity in this litigation has, thus far, been minimal. Defendant Deel seeks to remove his GPS device only now—after the United States produced trial exhibits that include dozens of conversations from Defendant Deel's personal cell phone highlighting the depth of Defendant's involvement in the alleged scheme.

The United States understands that travel and photography sessions with the GPS device may be less than ideal for wedding planning. Such minor inconveniences, however, do not trump the United States' significant interest in securing the appearance of Defendant Deel—who is alleged to have personally profited millions of dollars in the alleged scheme—at trial in two short months.

Dated: August 23, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2023, I will cause the foregoing brief to be electronically filed with the Clerk of the Court using the CM/ECF system, which will provide copies to counsel for all parties.

/s/ John J. Liolos

John J. Liolos, Trial Attorney

U.S. Department of Justice

Criminal Division, Fraud Section